

**REMARKS****I. Status of the Claims**

Claims 1-17 are all the claims currently pending.

By this Amendment, the title of the invention has been amended and claim 5 has been amended. No new matter has been introduced by this Amendment.

**II. Response To Objections To The Specification:**

The Examiner alleges that the title of the invention is not descriptive and, as such, a new title is required. Accordingly, the Applicant has herein amended the title. Specifically, the title has been amended to more particularly point out that the present invention is directed to “controlling an image input apparatus.” Thus, reconsideration and withdrawal of the objection of these claims are respectfully requested.

**III. Response To §112, Second Paragraph, Rejections To The Claim**

In the Office Action, the Examiner rejects claim 5 as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. Specifically, the Examiner states that the “connection stack” limitation of claim 5 is “grammatically unsound.” Accordingly, the Applicant has herein amended claim 5 to address the concerns of the Examiner. Thus, the Applicant respectfully requests reconsideration and withdrawal of the rejection of claim 5.

**IV. Rejections Under 35 U.S.C. §103**

Claims 1-4, 7-12, and 15-17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Applicant's Admitted Prior Art (AAPA) in further view of U.S. Patent 5,315,705 to Iwami et al. (hereafter Iwami). Additionally, claims 5, 6, 13, and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over AAPA and Iwami as applied to claims 1-4, 7-12, and 15-17 above, and further in view of U.S. Patent No. 6,259,469 to Ejima et al. (hereafter Ejima). The Applicant traverses the above rejections for the following reasons.

More specifically, under U.S. Patent Law, an Examiner must satisfy the following criteria in order to maintain a *prima facie* case of obviousness under 35 U.S.C. §103:

- 1) a suggestion or motivation, either in the cited references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine their teachings to arrive at the invention;
- 2) a reasonable expectation of success at arriving at the invention, if the combination of the cited references is made; and
- 3) the combination of the references cited must teach or suggest all the recited claim limitations.

We believe that the Examiner has not sufficiently proven at least two criteria noted above i.e., proper motivation in the cited prior art themselves to make the suggested combination, and a reasonable expectation of success at arriving at the invention, if the combination of the cited references is made.

In the AAPA, the apparatus does not appear to utilize or even need destination or correspondence information for the routing of a request. Instead, it appears that determining the mode of a request is all that is needed for automatic routing. To that end, the AAPA actually teaches away from the use of destination or correspondence information.

Iwami is directed to a communication address management system that is compatible with a plurality of communication application programs. In the Office Action, the Examiner noted that “Iwami teaches a destination control unit that includes a determination unit for determining the type of request, and an address management table for associating an address with a corresponding type of request.” However, as apparent from Figs. 5 and 8 in Iwami, the address management table of Iwai associates the communication address with the type of communication service, but does not associate the communication address with the type of request. The communication service in Iwami indicates the function of the apparatus, such as “voice” and “data,” which is different from the request, of the present invention, generated in a predetermined format on the basis of user input.

Furthermore, Iwami merely receives and notifies the type of communication service in response to the inquiry request, and does not determine the type of request or determine the destination of the request to be sent. Based on the foregoing, the Applicant maintains that Iwami fail to overcome the deficiencies noted above in AAPA. However, even if Iwami taught or suggested the use of destination or correspondence information stored in a memory (as suggested by the Examiner), there is no suggestion or motivation in AAPA for using such information. Finally, the teachings of Ejima do not appear to be sufficient to overcome the deficiencies noted above in AAPA and Iwami. Accordingly, the Examiner has failed to satisfy the first criteria for maintaining a *prima facie* case of obviousness under 35 U.S.C. §103.

With regard to the second criteria, if there is no suggestion or motivation in the AAPA related to the use of the routing or correspondence information, it logically follows that there could be no reasonable expectation of success at arriving at the invention if the Examiner’s suggested combination of AAPA, Iwami and Ejima were made. The Examiner, therefore, has

failed to satisfy the second criteria for maintaining a *prima facie* case of obviousness under 35 U.S.C. §103.

Based on the foregoing, independent claims 1, 9 and 17 are believed to be distinguishable over the AAPA, Iwami and Ejima, either individually or in combination. Likewise, dependent claims 2-8 and 10-16 are also believed to be distinguishable over AAPA, Iwami and Ejima based on their respective dependencies from claims 1 and 9.

**CONCLUSION**

Based on the foregoing amendments and remarks, Applicant respectfully requests reconsideration and withdrawal of the rejection of claims and allowance of this application.

**AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4717.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4717.

Respectfully submitted,  
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